

**STATEMENT OF BASIS (AI No. 110010)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0117781 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Quality NDT Inc.  
1227 Old Spanish Trail  
Broussard, Louisiana 70518

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** January 26, 2008

**1. PERMIT STATUS****A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

**B. LPDES permits –** LA0117781  
LPDES permit effective date: February 1, 2004  
LPDES permit expiration date: January 31, 2009

**C. Date Application Received:** August 4, 2008

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - oilfield service company**

Quality NDT Inc. is an existing oilfield service company that repairs oilfield equipment.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: II (BPJ to 0 points because the facility is only discharging a small amount of sanitary wastewater.)
3. Wastewater Type: III
4. SIC code: 1389

**C. LOCATION -** 1227 Old Spanish Trail, Broussard St. Martin Parish  
Latitude 30° 06' 20", Longitude 91° 55' 17"

Statement of Basis for  
Quality NDT Inc.,  
LA0117781, AI No. 110010  
Page 2

### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant with aeration and clarification  
Location: at the point of discharge from the sewage treatment plant  
Flow: 390 gpd  
Discharge Route: local drainage thence to Cypress Bayou

### 4. RECEIVING WATERS

STREAM - local drainage thence to Cypress Bayou

BASIN AND SEGMENT - Vermilion-Teche Basin, Segment 060801

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
f. agriculture

### 5. TMDL STATUS

Subsegment 060801, Vermilion River - From Headwaters to LA 3073 Bridge, is not listed on LDEQ's Final 2006 303(d) list as impaired. However, subsegment 060801 was previously listed as impaired for phosphorus, nitrogen, organic enrichment/low DO, pathogen indicators, suspended solids/turbidity/siltation, and carbofuran for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and /or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

Total Maximum Daily Loads (TMDLs) completed:

#### Carbofuran

The TMDL for Carbofuran in the Mermentau and Vermilion Teche River Basins was final on March 21, 2002. No allocation was given to point source discharges in the Vermilion Teche River Basin. According to the TMDL, there is only one point source in the Vermilion Teche (FMC Corp. LA0064360); however, it no longer discharges Carbofuran. In addition, this facility has no potential to discharge Carbofuran. Therefore, requirements for Carbofuran will not be placed in this permit.

Statement of Basis for  
Quality NDT Inc.,  
LA0117781, AI No. 110010  
Page 3

#### Nitrogen/Phosphorus

The TMDL for Dissolved Oxygen and Nutrients in the Vermilion River was final on April 5, 2001. No allocation was given to point source discharges in the Vermilion Teche River Basin. LDEQ's position on nutrients, as supported by the ruling in *Sierra Club v. Givens*, 710 So.2d 249 (La. App. 1st Cir. 1997), writ denied, 705 So.2d 1106 (La. 1998), is that when oxygen-demanding substances are controlled and limited in order to ensure that the dissolved oxygen criterion is supported, nutrients are also controlled and limited. LAC 33:IX.2707.D.1.f.iii allows the establishment of effluent limitations based on an indicator parameter for the pollutant of concern. LDEQ's consistent approach to controlling nutrients where the WQMP does not otherwise require specific nutrient limitations is achieved by limiting the discharge of oxygen-demanding substances through a BOD<sub>5</sub> limitation. Compliance with the BOD<sub>5</sub> limitation as the indicator parameter will result in the control of nutrients from the discharge sufficient to attain and maintain the applicable water quality standard. Effluent monitoring of the indicator parameter as conducted by the permittee in accordance with this permit in addition to LDEQ's ambient water quality monitoring program will allow for further evaluation by the Department to determine the effectiveness of the limitation. The reopener clause located in this permit allows the Department to modify or revoke and reissue the permit if the limitations as set on the indicator parameter are shown to no longer attain and maintain applicable water quality standards.

#### Suspended solids/turbidity/siltation

As per the TMDL for TSS, Turbidity, and Siltation for the 15 Subsegments in the Vermilion River Basin, point source loads are so small as to be insignificant, and because effective policies are in place to limit TSS discharges, no specific reductions from point sources are required. Standard TSS limitations are included in this permit.

#### Organic Enrichment/Low DO

Per the EPA's Vermilion River Dissolved Oxygen and Nitrogen TMDL, the limits apply to sanitary discharges, and process outfalls of food processors and seafood processors. For discharges less than 25,000 GPD, secondary limits shall apply as per the TMDL. The organic enrichment/low DO impairment shall be addressed through the BOD<sub>5</sub> parameter established in this permit.

#### Pathogen Indicators

Per The Vermilion River Fecal Coliform TMDL, there will be no change in the permit requirements based upon a wasteload allocation resulting from this TMDL. The pathogen indicators impairment shall be addressed through the standard fecal coliform limitations established in this permit.

### **6. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

- The monitoring frequency for Outfall 001 is being changed from 1/quarter to semiannually, the limits have been updated in accordance with the reissuance of the Class I Sanitary Discharge General Permit and the fecal coliform limit has been changed from weekly average to daily max.

### **7. COMPLIANCE HISTORY/COMMENTS**

There were no recent inspections at the facility.

Statement of Basis for  
 Quality NDT Inc.,  
 LA0117781, AI No. 110010  
 Page 4

#### DMR Review/Excursions –

There were no excursions found for the last two years (October 2008-October 2006). All DMR's were submitted in accordance with the current permit.

### 8. EXISTING EFFLUENT LIMITS

Outfall 001 – treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Weekly Average
Flow	Report 1/quarter Est.	Report 1/quarter Est.
BOD <sub>5</sub>	---	45 mg/L 1/quarter Grab
TSS	---	45 mg/L 1/ quarter Grab
Fecal Coliform	---	400 col./100mL 1/quarter Grab
pH	6.0-9.0 s.u. 1/quarter Grab	

### 9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 060801 of the Vermilion-Teche Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008, from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

Statement of Basis for  
Quality NDT Inc.,  
LA0117781, AI No. 110010  
Page 5

#### **10. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

#### **11. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

#### **12. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for  
 Quality NDT Inc.  
 LA0117781, AI No. 110010  
 Page 6

### Rationale for Quality NDT Inc.

1. **Outfall 001** - treated sanitary wastewater (estimated flow is 390 gpd)

Pollutant	Limitation		Reference
	Monthly Avg mg/L	Weekly Avg	
Flow	---	Report	
BOD <sub>5</sub>	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	200	400 (Daily Max)	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000

**Treatment:** sewage treatment plant with aeration and clarification

**Monitoring Frequency:** Semiannually for all parameters at the point of discharge from the sewage treatment plant prior to mixing with other waters. The monitoring frequency is being changed from quarterly to semiannually based on the fact that there were no excursions found of the DMR's for the last two years.

**Limits Justification:** Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective November 1, 2007.

\* Existing permits for similar outfalls  
 BPJ Best Professional Judgement  
 s.u. Standard Units

#### NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

### STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 are considered to have storm water discharges associated with industrial activity.

**For first time permit issuance,** the permittee shall prepare, implement, and maintain a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit. **For renewal permit issuance,** the permittee shall review and update, if necessary, a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit.

The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).